GS GELBER + SANTILLO

May 27, 2020

VIA FACSIMILE

The Honorable Kimba M. Wood
United States District Court
Southern District of New York
500 Pearl Street
New York, NY 10007-1312

> USDC SDNY
> DOCUMENT
> ELECTRONICALLY FILED
> DOC #:_____
> DATE FILED: 5/28/20

Re: *United States v. Zoraida Gonzalez*, 1:20-cr-00199-KMW

Dear Judge Wood:

I write on behalf of defendant Zoraida Gonzalez to seek a modification of the terms of her pretrial release to allow her to travel to New Jersey, in addition to the Southern and Eastern Districts of New York, without prior authorization. Pretrial and the Government do not object to this request.

On February 14, 2020, Ms. Gonzalez was arrested in connection with charges for the non-violent offenses of false claims, theft of government funds, wire fraud, healthcare fraud, conspiracy, aggravated identity theft and a violation of the anti-kickback statute arising out of an alleged scheme to fraudulently bill Medicaid for non-emergency transportation costs. Among other conditions, Ms. Gonzalez was released on a $50,000 personal recognizance bond, which has been signed by two financially responsible persons, her travel was limited to the Southern and Eastern Districts of New York, and she was directed to continue or seek employment.

On February 25, 2020, Magistrate Judge Cave modified the conditions of Ms. Gonzalez's release to allow her to travel to the Districts of New Jersey and Connecticut for the purposes of work only. Ms. Gonzalez now seeks a modification of these conditions to allow her to travel to New Jersey more generally to facilitate visits with close family, who live in New Jersey, and to attend a family church there. Pretrial Services and the Government have no objection to this request. Thank you for your consideration

Granted

Very truly yours,

/s/ Kristen M. Santillo
KRISTEN M. SANTILLO

CC: AUSA Kedar Bhatia
AUSA Brandon Harper
Pretrial Services Officer Andrew Pascual

Kimba M. Wood   5/28/20
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SO ORDERED

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